


<b>CENTRAL VALLEY NATURAL GAS STORAGE PROJECT</b>	<b>VARIANCE REQUEST FORM</b>	
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<b>Date Required:</b>	February 13, 2012	<b>Variance Request No.:</b>	<b>No. 16 – Saltwater Tank Test Water Discharge</b>
<b>Date Submitted:</b>	<b>Original Submittal:</b> February 6, 2012 <b>Revised Submittal:</b> February 10, 2012	<b>Location:</b>	Agricultural field adjacent to remote well pad
<b>Property Owner(s):</b>	Jerry Southam	<b>Parcel No.:</b>	012-110-017
<b>Current Land Use:</b>	Rice	<b>Sensitive Resources:</b>	Rice fields provide habitat for giant garter snake

**Variance from:** This variance requests the CPUC’s approval to allow CVGS to discharge approximately 130,000 gallons of test water from the saltwater tank into an adjacent rice field. The saltwater tank will be filled to test the integrity of the tank and then the water discharged into the adjacent rice field. The project description in the MND and the Dewatering and Discharge Plan did not specifically describe the use and discharge of saltwater tank hydro-test water into the adjacent field.

**Description and Justification for Variance:** CVGS will obtain the 130,000 gallons of test water from two locations near the remote well pad: 1) the well at the north end of Princeton (“North Point Well”) and 2) the canal that runs parallel to State Highway 45 (south of Spencer Road and north of Paradise Road). The water will be pumped from these two sources by the water truck. The water truck will transport the test water to the remote well pad where it will then be pumped by the water truck into the saltwater tank. After the testing is complete, the water will then be gravity drained using a fire hose and discharged into the adjacent agricultural field. CVGS does not anticipate the need to use any pumps or install pipelines to support this test water activity. The saltwater test activity is currently scheduled for February 14, 2012 and needs to be completed by February 18, 2012 (as requested by the landowner).

CVGS has coordinated with Mr. Jerry Southam and received his written approval for this discharge of test water onto his field (written approval provided via email on February 9, 2012).

**Environmental Analysis:** A brief description of the potential environmental effects associated with the discharge of saltwater tank test water is described below.

***Aesthetics.*** The visual impacts would be the same as those described in the IS/MND. No mitigation is required.

***Agricultural and Forestry Resources.*** No impacts on agricultural or forestry resources are anticipated. No new mitigation has been identified.

***Air Quality and GHG Emissions.*** The test water would not result in any new or greater impacts than were previously described in the MND. No new mitigation has been identified.

***Biological Resources.*** Test water will be discharged into an adjacent agricultural field. The discharge will not affect giant garter snakes because the snakes are currently in upland refugia habitat and will not be active during the discharge period. No impacts will occur on this upland refugia habitat and no other impacts on biological resources are anticipated. The monitoring biologist will be on-site when the water is pumped out of the canal and will be on-site during discharge of the test water to ensure no impacts occur. No new mitigation has been identified.

***Cultural Resources.*** No impacts on cultural resources are anticipated and no mitigation has been identified.

***Geology and Soils.*** The discharge of test water would not result in any new or greater impacts than were previously described in the MND for geologic, soil, and seismic site conditions. No mitigation is required.

***Hazards and Hazardous Materials.*** The discharge of test water would not result in any new or greater impacts than were previously described in the MND. No new mitigation has been identified.

***Hydrology and Water Quality.*** The discharge of test water would not result in any new or greater impacts than were previously described in the MND for hydrology and water quality. As described previously, the test water would be discharged into an adjacent agricultural field and not into drainages. No mitigation is required.

***Land Use and Planning.*** No potentially significant impacts related to land use have been identified. No mitigation is required.

***Mineral Resources.*** The discharge of test water would not have a significant effect on mineral and energy resources and would not result in the loss of the availability of the resources because none occur in the project area. No mitigation is required.

***Noise.*** The discharge of test water will not result in any noise-related impacts. No mitigation is required.

***Population and Housing.*** The discharge of test water would not result in any new or greater impacts than were previously described in the MND. No mitigation is required.



***Public Services.*** The discharge of test water would not result in any new or greater impacts on public services than were discussed in the MND. No mitigation is required.

**Recreation.** The discharge of test water would not result in recreation impacts. No mitigation is required.

**Transportation/Traffic.** The discharge of test water would not result in transportation or traffic impacts. No mitigation is required.

**Utilities and Service Systems.** The test water discharge would not require an expansion or improvement in utilities or service systems, including wastewater and water supply treatment or delivery. No mitigation is required.

**Site Conditions/Comments:** The area is substantially degraded from current construction activities and agricultural production.

Approvals	Date	Name (print)	Signature	Comments
CPUC Compliance Mgr				
Central Valley Construction Manager	2/10/12	Dirk de Bruyn		
Central Valley Environmental Manager	2/10/12	Susan Bushnell Bergfalk		None

**Prepared by:** Susan Bushnell Bergfalk, Environmental Manager, ICF International

**Date:** February 10, 2012